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Gaming, LLC, Pioneer OpCo, LLC, Apollo
Global Management, Inc., Susan Schaffer,
Thomas LaRosa, and Yvonne Brooks*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

HEATHER KEARNEY, an individual;
TIGRAN KARAKASHYAN, an individual;
FREDRIC SAFLOR, an individual; and
MARK RAYBURN, an individual,

Plaintiffs,

vs.

VENETIAN LAS VEGAS GAMING, LLC
d/b/a THE VENETIAN LAS VEGAS d/b/a
THE VENETIAN RESORT LAS VEGAS, a
domestic limited-liability company; PIONEER
OPCO, LLC, a domestic limited-liability
company; APOLLO GLOBAL
MANAGEMENT, INC., a corporation;
THOMAS LAROSA, an individual;
YVONNE BROOKS, an individual; SUSAN
SCHAFFER, an individual; BRYAN
GURDEN, an individual; DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive,

Defendants.

Case No.: 2:25-cv-01121-GMN-MDC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO FILE RESPONSE TO PLAINTIFFS'
FIRST AMENDED COMPLAINT**

(First Request)

Pursuant to Local Rules IA 6-1 and IA 6-2, Defendants Venetian Las Vegas Gaming, LLC, Pioneer OpCo, LLC, Apollo Global Management, Inc., Susan Schaffer, Thomas LaRosa, Yvonne Brooks and Plaintiffs Heather Kearney, Tigran Karakashyan, Fredric Saflor and Mark Rayburn (“Plaintiffs”) hereby request that Defendants be granted a two-week extension of time, up to an

1 including August 4, 2025, to file their response to Plaintiffs' First Amended Complaint (ECF. No.
2 10). The present deadline for Defendants to file their response is July 21, 2025. This is the parties'
3 first request for an extension of time for Defendants to file their response to the Plaintiffs' First
4 Amended Complaint.

5 Defendants removed this action on June 23, 2025 (ECF No. 1). On July 1, 2025, the Order
6 extending Defendants' time to respond to the Complaint to July 21, 2025 was entered. (ECF No.
7 7). On July 8, 2025, Plaintiffs filed their First Amended Complaint (ECF No. 10), and their
8 Motion to Remand to State Court on July 16, 2025. Defendants respectfully request this extension
9 in order to allow the parties time to discuss the procedural posture of this matter, as well as
10 continue to researching the background facts and circumstances of this case, and not for purposes
11 of delay. Good cause exists to extend the response deadline.

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Therefore, the parties respectfully request a fourteen-day extension of time up to and including August 4, 2025 for Defendants to file their response to Plaintiff's Complaint.

DATED this 21st day of July, 2025.

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C

/s/ Molly M. Rezac

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200 S. Virginia Street, 8th Floor

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*Attorneys for Defendants, Venetian Las Vegas
Gaming, LLC, Pioneer OpCo, LLC, Apollo
Global Management, Inc., Susan Schaffer,
Thomas LaRosa, and Yvonne Brooks*

DATED this 21st day of July, 2025.

FILIPIAK LAW

/s/ Michael J. Filipiak

Nevada Bar No. 12962

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*Attorney for Plaintiffs, Heather Kearney, Tigran
Karakashyan, Fredric Saflor and
Mark Rayburn*

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

7-29-25

DATED